

WRIGHT, FINLAY & ZAK, LLP

Edgar C. Smith, Esq.
Nevada Bar No. 5506
Rock K. Jung, Esq.
Nevada Bar No. 10906
7785 W. Sahara Avenue, Suite 200
Las Vegas, NV 89117
(702) 475-7964; Fax: (702) 946-1345
esmith@wrightlegal.net
rjung@wrightlegal.net
*Attorneys for Plaintiff, U.S. Bank Trust, N.A.,
as Trustee for LSF9 Master Participation Trust*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. BANK TRUST, N.A., AS TRUSTEE
FOR LSF9 MASTER PARTICIPATION
TRUST,

Plaintiff,

vs.

LN MANAGEMENT, LLC SERIES 4004
CAPE SAND,

Defendant.

Case No.: 2:17-cv-01109-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO AMEND
PLEADINGS AND ADD PARTIES**

FIRST REQUEST

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1 Comes now Plaintiff, U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation
2 Trust (hereinafter “U.S. Bank” or “Plaintiff”), by and through its counsel of record, Rock K.
3 Jung, Esq. and Defendant, LN Management, LLC Series 4004 Cape Sand (“LN Management” or
4 “Defendant”), by and through its counsel of record, Kerry P. Faughnan, Esq., hereby stipulate as
5 follows:

6 **STIPULATION**

- 7 1. Plaintiff filed its Complaint on April 21, 2017 [ECF 1].
- 8 2. Defendant appeared on May 26, 2017 and filed a Demand for Security of Costs
9 [ECF 9]
- 10 3. Plaintiff filed its Security of Costs on June 6, 2017 [ECF 12]
- 11 4. On August 16, 2017 Defendant filed its Answer [ECF 14].
- 12 5. On August 16, 2017 Defendant filed its Motion to Dismiss [ECF 15]
- 13 6. On August 30, 2017, Plaintiff filed its Opposition to the Motion to Dismiss [ECF
14 16]..
- 15 7. On September 5, 2017 the parties filed their Stipulated Discovery Plan and
16 Scheduling Order [ECF 17] setting the deadline for amending pleadings and adding parties as
17 November 15, 2017.
- 18 8. On December 5, 2017, the parties completed their mandatory mediation through
19 the Nevada Real Estate Division (NRED), but the mediation was unsuccessful.
- 20 9. On December 14, 2017 the parties filed their Joint Interim Status Report [ECF
21 20].
- 22 10. Now that the mandatory mediation has concluded and some discovery has been
23 conducted, the parties agree that non-party Las Hadas Homeowners Association (“HOA”) should
24 be added as a party.
- 25 11. The parties agree that the deadline to Amend Pleadings and to Add Parties should
26 be extended from November 14, 2017 to January 14, 2018. ///

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1 IT IS SO STIPULATED.

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3 DATED this 15th day of December, 2017.

DATED this 15th day of December, 2017.

5 **WRIGHT, FINLAY & ZAK, LLP**

**LAW OFFICE OF KERRY P.
FAUGHNAN**

7 /s/ Rock K. Jung, Esq.
8 Rock K. Jung, Esq.
9 Nevada Bar No. 10906
10 7785 W. Sahara Ave, Suite 200
11 Las Vegas, NV 89117
12 rjung@wrightlegal.net
13 *Attorneys for Plaintiff, U.S. Bank Trust,*
14 *N.A., as Trustee for LSF9 Master*
15 *Participation Trust*

/s/ Kerry P. Faughnan, Esq.
Kerry P. Faughnan, Esq.
Nevada Bar No. 12204
P.O. Box 335361
North Las Vegas, NV 89033
Kerry.faughnan@gmail.com
Attorneys for Plaintiff, U.S. Bank, N.A., as
Trustee for the Certificateholders of Banc of
America Funding Corporation Mortgage Pass-
Through Certificates, Series 2006-1

15 **ORDER**

16 **IT IS SO ORDERED.**

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18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 12/18/17
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP; that electronic service of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO AMEND PLEADINGS AND ADD PARTIES (FIRST REQUEST)** was made on the 15th day of December, 2017, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing.

/s/ Kelli Wightman
An Employee of WRIGHT, FINLAY & ZAK,